

January 9, 2015

RE: 2014 Title V Emission Inventory

**Name

**Title

**Company

**Mailing Address

This is to remind you of upcoming deadlines for submission of your emission inventory to the Air Quality Division (Division). As required under Chapter 6, Section 3(f)(v)(G) of Wyoming Air Quality Standards and Regulations (WAQSR), emissions inventories shall be submitted to the Division for fee assessment and compliance determinations within **sixty (60) days** following the end of calendar year.

As noted in two November letters to Wyoming Title V Sources, the Division is transitioning to a new online Inventory, Monitoring, Permitting, And Compliance Tracking (IMPACT) data system. The preferred method for submitting actual calendar year 2014 emissions is through the new IMPACT system. Training for use of the IMPACT system will be available at multiple locations in Wyoming and in Denver, Colorado. Please go to <http://deq.wyoming.gov/aqd/impact-system/> for information about these classes and how to sign up.

For those sources not using the IMPACT system for CY-2014, and as noted below, please download the Air Quality Division's (Division's) Emissions Inventory forms for use in completing the emissions inventory of criteria and hazardous air pollutants for calendar year 2014 from the Division's website. Emissions inventories for 2014 must be **postmarked no later than March 1, 2015**. A Responsible Official for the facility must sign the completed emission inventory, certifying that, based on information and belief formed after reasonable inquiry, the information contained therein is true, accurate and complete.

For sources using the IMPACT system, the emission inventory also must be submitted **by March 1, 2015, and must be submitted by a Responsible Official**. Please proceed to <http://deq.wyoming.gov/admin/e-portal/> for information on obtaining a user account. User account information is also provided in training sessions. If needed, please contact the Division via email at deq-air-impact@wyo.gov for further questions regarding IMPACT.

To minimize additional information requests, please consider the following:

- **PM_{2.5} Emissions** - Note that PM_{2.5} is included as a reported pollutant for the inventory. In most cases, it is anticipated that emission estimates for PM_{2.5} will be made using manufacturer data, AP-42 emission factors, or other available emission factor data, as few sources in the state have been tested for PM_{2.5}. Billing will be based upon PM₁₀ emissions, under the assumption that PM₁₀ emissions should be greater than or equal to PM_{2.5} emissions. Should PM_{2.5} emissions exceed PM₁₀ emissions in the inventory, the invoice will be based upon the larger value. Facilities will not be double-billed for PM emissions. The invoice will list the pollutant as PM₁₀.

- Fugitive Emissions - The emission inventory must include an accounting of fugitive emissions.
- Excess Emissions - The emission inventory must include any emissions in excess of allowable rates that occur as the result of start-ups, shutdowns and equipment malfunction and/or failure.
- Ammonia Emissions - Please report any ammonia emissions from your facility.
- Non-Operating Sources - All emission units must be identified in the inventory. Emission units not operating or shut down should be identified as such.
- Pigging, Blowdowns, Rod Packing, and Compressor Startups – These types of emissions should be included in the inventory.
- Incidental Emissions - Emissions from activities that are incidental to a source's primary business function need not be reported if they are less than one ton (2000 pounds) per year. (For example, plant maintenance and upkeep activities, welding, painting, air conditioning, ventilating, heating units for human comfort, and the like.) For non-incidental emissions, see Small Sources below.
- Emission Inventory Forms - The Division's Emission Inventory forms are available in Word and PDF formats on our website at: <http://deq.wyoming.gov/aqd/emission-inventories/resources/major-title-v-emissions/> Not all of the forms are applicable to all facilities. Please select the forms that are appropriate for your facility. If using IMPACT, the forms may be useful in some cases to submit as background calculation attachments.

For sources NOT using the IMPACT system to submit an inventory:

- Source ID's and Descriptions – Please use identification numbers and descriptions of emission units which correspond to those contained in the operating permit or the operating permit application submitted for each facility. If you have questions, please contact your District Air Quality Engineer.
- Estimated Potential Emissions - Entries under “Estimated Potential Emissions” on the inventory need to be included with the inventory.
- PM_{2.5} Form - Please use the “PM_{2.5} Source Emissions” form on our website to list the PM_{2.5} emissions from your facility's emission sources. In addition, include information regarding the emissions factors; i.e., methods used to calculate emissions and the emission factors used, test data, and any other assumptions made, as requested by the form.
- HAP Emissions - If hazardous pollutants are emitted at your facility, fill out HAP Form A for each emission point. Emissions of regulated hazardous pollutants listed under Section 112(b) of the Clean Air Act need not be reported on HAP Form A if such emissions are less than 50 pounds of combined HAP per source per year, and the actual emission levels do not exceed exemptions based on insignificant emission levels established through rulemaking by EPA.
- Small Sources - For small operating sources, actual emissions that are reasonably expected to be less than 50 lbs per year can be stated at < 50 lbs/yr without further calculation, though operating parameters should still be provided (like hours of operation, throughput, fuel use, etc.).

Emissions occurring during 2014 will be billed at a rate of \$34.50 per ton of billable pollutants. For those Title V Sources not using the IMPACT system, please return the original (signed by a Responsible Official) and one copy of each section of the completed inventory to:

Administrator, Air Quality Division-DEQ
c/o Janet Stephens, Operating Permits Program
122 West 25th Street
Herschler Building, 2-East
Cheyenne, Wyoming 82002

If you have difficulty in completing any of the inventory forms, please contact the District Engineer responsible for your area of the State as noted on page 3 of your operating permit, or the Cheyenne office at (307)777-3784. Your cooperation in the timely and accurate completion of the 2014 emission inventory is appreciated.

Sincerely,

A handwritten signature in blue ink that reads "Lori N. Bocchino". The signature is written in a cursive, flowing style.

Lori N. Bocchino
Title V Operating Permit Program Manager
Air Quality Division

cc: Title V Permit Files